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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA,

Crim. No. 18-CR-300 36-MGM

Violation

v.

18 U.S.C. § 2252(a)(4)(B) -
Possession Of Child Pornography
(Count 1)

EMIL KAUFMAN,

Defendant.

18 U.S.C. § 2253
Forfeiture Allegation

INFORMATION

The United States Attorney charges:

COUNT ONE: 18 U.S.C. § 2252(a)(4)(B) - Possession Of Child Pornography

1. On or about June 26, 2013, within the District of Massachusetts and elsewhere,

EMIL KAUFMAN,

defendant herein, knowingly possessed, and knowingly accessed with intent to view, one or more books, magazines, periodicals, films, video tapes, and other matter which contained a visual depiction that had been mailed, and had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed and so shipped and transported, by any means including by computer, the producing of such visual depiction involving the use of a minor engaging in sexually explicit conduct and such visual depiction being of such conduct; that is **EMIL KAUFMAN** knowingly possessed and knowingly accessed with intent to view a computer and computer media which contained visual depictions of minors engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), such as computer

files with the following file names:

- a. [MB]!!!!NEW!!!!Little devon 10yo cum in father's mouth -HOT!!!.avi;
- b. 10yo_masturb(4).wmv;
- c. (yamad)Little Boy Bondage 11Yo And Men Full Version - Gay Pedo Pthc.mpg;
and
- d. 12yo boy brutal rape w 14in dildo.wmv.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The United States Attorney further alleges:

2. The allegations of Count One of this Information are hereby re-alleged and are incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

3. Upon conviction of the offense in violation of 18 U.S.C. § 2252(a)(4)(B) set forth in Count One of this Information,

EMIL KAUFMAN,

defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18; or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 or Title 18; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, one Apple MacBook Pro laptop with serial number WQ024R7QATM; one 1 TB Seagate Expansion External Drive with serial number 2GHKYPTM; and one 320 GB Seagate Expansion Portable Drive with serial number 2GH2YGR6.

4. If any of the property described in Paragraph 3 above, as a result of any act or omission of the defendant -

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 18 U.S.C. § 2253(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 3 above.

All pursuant to Federal Rule of Criminal Procedure 32.2 and Title 18, United States Code, Section 2253.

ANDREW E. LELLING
United States Attorney

By: 
Kevin O'Regan
Assistant U.S. Attorney

Dated: August 28, 2018